Carpe Diem's data protection measures have helped to streamline business processes and foster trust with parents, says Mr Tan Kiah Hui, its group data protection officer.

CHALLENGES

Carpe Diem needed to address areas in business processes and documents that could lead to unauthorised disclosure of personal data.

STEPS TAKEN

- Developed data flow diagrams to identify areas where personal data could be compromised
- Implemented new visitor forms to collect only necessary personal information
- Limited access to children's registration records
- Compliance manuals and training were also provided
- All personal data is classified as confidential

BENEFITS

- Streamlined business processes
- Built trust with parents
- Successfully turned data protection into a competitive advantage

SECURING PERSONAL DATA IS CHILD'S PLAY

Childcare service provider Carpe Diem took just three months to shore up its data protection measures while streamlining its business processes

Parents who visit Carpe Diem's 26 childcare centres can now be assured that their personal data is better protected, thanks to new data protection measures that kicked in last year to build consumer trust.

For one thing, they no longer need to fill in a visitor log book with personal data like they did before. "As the log book was viewed by all visitors, the personal information in it could be inadvertently disclosed," said Mr Tan Kiah Hui, the group data protection officer (DPO) at Carpe Diem who was tasked with beefing up the childcare service provider's data protection practices.

"So, at some centres, we did away with the log book and provided new individual forms for visitors to fill, while our staff will fill up visitors' details at centres that are still using log books," he added. This new process ensures that new visitors would not be able to view the personal data of previous visitors.

Also, the forms only require visiting parents to provide necessary information such as their names, contact numbers, and the age of their child.

"We no longer require potential customers to fill in their addresses as it is unnecessary at this early stage," Mr Tan said, adding that this has helped to streamline business processes by avoiding the collection of duplicate data such as addresses, which would otherwise be collected again if a parent decides to enrol a child.

Mr Tan said consent is also sought for the collection and use of data – and only for specified uses. This further ensures that no unnecessary personal data is collected, thus minimising the risk of data breaches.

Since July 2014, the Personal Data Protection Act (PDPA) requires all organisations in Singapore to seek consent and notify individuals on the collection, use and disclosure of personal data for specific purposes. They must also safeguard all personal data under their care.

Identifying potential data breaches

Complying with the new data protection rules is not as onerous as it seems, as Mr Tan has found. After he attended a Workforce Skills Qualifications (WSQ) accredited course in June 2014 that helped him to understand the broad concepts under the PDPA, he sprung into action and concluded his compliance efforts in just three months.

For a start, Mr Tan took up a certification course in information privacy management offered by a local PDPA training provider, which also guided him on what to include in a data protection policy.

Armed with his new knowledge from his previous job at a bank, he developed data flow diagrams, which showed where and how data was collected, used and disclosed for business processes such as child registration.

"The data flow diagrams were useful in identifying areas where personal data could be compromised," Mr Tan said.

For example, he found that letting all teachers access children's registration records could lead to potential data breaches. Such records typically include parents' personal data such as salary figures that may be required for childcare subsidy applications.

Limiting access to personal data

The PDPA requires organisations to make security arrangements to protect personal data, so measures were swiftly put in place to address potential problem areas. Access to children's registration records is now limited to authorised staff, while personal data has been excluded from "communications books" used by teachers to update parents on a child's progress and behaviour in school.

Additionally, all personal data is now classified as confidential and recorded in physical documents, which are kept safely in Carpe Diem's offices under lock and key, to minimise the risk of data falling into the wrong hands.

Mr Tan has also developed a "mission statement" that underpins the data protection practices of all Carpe Diem childcare centres, along with privacy notices, policies and an information security policy. These were consolidated into a compliance manual, which staff can refer to anytime.

Overcoming barriers

Not surprisingly, Mr Tan faced resistance from some employees while shoring up the company's data protection practices, as the new measures made it less convenient for staff to access personal data.

"The teachers are often not aware of why we're doing this, so I had to educate them about the importance of safeguarding personal data," he said.

Mr Tan also trained the childcare centres' appointed DPOs, who have in turn trained their colleagues. Each DPO is required to submit a PDPA compliance report to Mr Tan for review twice a year.

In all, Carpe Diem spent about S$10,000 for all its 26 centres on training four staff members, certification and legal fees.

Building trust with parents

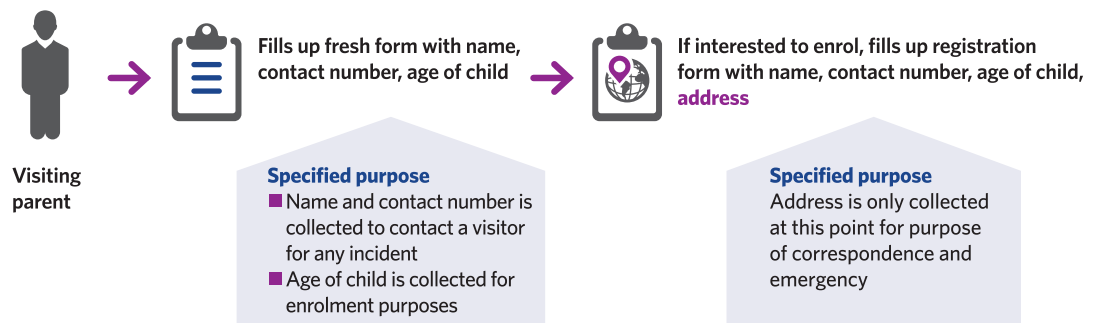
Mr Tan felt the effort was worthwhile as the company has managed to foster trust with parents who can be assured that their personal data, as well as that of their children, would remain secure.

Indeed, parental trust may well be Carpe Diem's competitive advantage. Mr Tan said the company is likely to be the only childcare service provider in Singapore with a certified information privacy manager as its DPO. "Parents trust that we know what we're doing with their personal data," he said.

Mr Tan's work does not end even though Carpe Diem's data protection policies are firmly in place. "Compliance is an ongoing process, as there may be gaps in processes that may crop up later on. We have to be ready to tweak things along the way," Mr Tan said.

REVISED WORKFLOW

Previously, parents were required to fill in a logbook with their addresses. In view of possible over collection of personal data, a new data collection workflow was introduced.


Visiting parent
Fills up fresh form with name, contact number, age of child
If interested to enrol, fills up registration form with name, contact number, age of child, address
Specified purpose
Name and contact number is collected to contact a visitor for any incident
Age of child is collected for enrolment purposes
Specified purpose
Address is only collected at this point for purpose of correspondence and emergency